

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

REGMON L. HAWKINS, *individually and
on behalf of all others similarly situated,*

Plaintiff,

v.

S2VERIFY, *a foreign limited liability
company,*

Defendant.

Case No. 3:15-cv-03502 WHA

**DECLARATION OF STEVEN R. PLATT REGARDING DISTRIBUTION OF
SETTLEMENT FUNDS**

I, Steven R. Platt, declare as follows:

1. I am a competent adult, over the age of eighteen, and this declaration is based upon my personal knowledge.
2. I am an employee of American Legal Claim Services, LLC ("ALCS"). ALCS was appointed as the Class Administrator for the purpose of administering the Settlement. I was principally responsible for overseeing the distribution of Settlement funds.
3. Under the final approval order entered by the Court, the net settlement amount payable to the Class Members, after deducting Class Counsel's fees and costs, the lead plaintiff's service award, and ALCS's administration expenses, was \$759,393.33.
4. In accordance with the Court's Final Approval Order, ALCS disbursed the class administrator's fees, the service award, and one half of Class Counsel's attorneys' fees and costs immediately after the Final Approval Order. ALCS has retained the remaining one-half of attorneys' fees and costs, which the Court ruled could not be paid "until all disbursements to class members are complete, and there is no further work to be done under the terms of the class settlement."
5. On May 26, 2017, ALCS mailed 4,295 Settlement Checks to each Class Member's last

1 known address via USPS First Class Mail. Each Class Member's award check was valued
2 \$176.80. The Lead Plaintiff's check included the \$1,000.00 incentive award and the
3 \$176.80 Class Member award, totaling \$1,176.80. Each check was valid for 60 days and
4 after the check cashing period expired, 2,663 Class Members had presented settlement
5 checks totaling \$471,818.40, for payment. On August 3, 2017, unclaimed funds from the
6 first distribution totaled \$288,714.40.

7 6. On August 3, 2017, ALCS received a late reissue request from a Class Member and the
8 parties agreed to allow the late payment request and to include the Class Member in the
9 second distribution.

10 7. On August 4, 2017, ALCS completed the reallocation of unclaimed funds from the first
11 distribution, by reserving \$176.80 for the late payment request. The reallocation of
12 unclaimed funds totaling \$288,537.60 was allocated to the 2,664 Class Members.

13 8. On August 4, 2017, ALCS mailed 2,644 Settlement Checks totaling \$288,511.20. Each
14 Class Member's check for the second mailing was valued at \$108.30. After the 60-day
15 check cashing period had expired, 2,291 Class Members had presented their second
16 settlement checks totaling \$248,115.30, for payment.

17 9. On October 7, 2017, unclaimed funds from the second distribution totaled \$40,395.90.

18 10. During the course of the second distribution and for 50 days after the expiration of the
19 second distribution check cashing period, ALCS continue to receive reissue requests
20 pertaining to both the first distribution and second distribution to Class Members. In an
21 effort to maximize Class Recovery the parties agreed to honor these requests.

22 11. As of December 6, 2017, Class Members had presented 5,022 Settlement Checks totaling
23 \$729,832.60 in awards, for recovery of 96.1% of the Net Settlement Funds available to the
24 Class.

25 12. As of December 6, 2017, unclaimed funds total \$29,560.73. This includes 22 checks that
26 remain outstanding and total \$3,341.60. Those checks must be presented for payment no
27 later than December 27, 2017, or else they will expire.
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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge,
2 information, and belief. Executed on December 6, 2017.

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5 
6 Steven R. Platt